

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAL MANSY,

Defendant.

Case: 2:15-mj-30549  
Judge: Unassigned,  
Filed: 11-23-2015  
REM: USA v SAL MANSY (MAW)

/

**GOVERNMENT'S PETITION  
FOR TRANSFER OF DEFENDANT TO  
ANOTHER DISTRICT AND SUPPORTING BRIEF**

Pursuant to Rule 5(c)(3)(D) of the Federal Rules of Criminal Procedure, the United States of America hereby petitions the Court for an order transferring defendant Sal Mansy to answer to charges pending in another federal district, and states:

1. On or about November 23, 2015, defendant was arrested in the Eastern District of Michigan in connection with a federal arrest warrant issued in the District of Main based on an Indictment. Defendant is charged in that district with 18 USC §§ 1960 and 2 – Operation of an unlicensed money transmitting business.

2. Rule 5 requires this Court to determine whether defendant is the person named in the arrest warrant described in Paragraph One above. *See* Fed. R. Crim. P. 5(c)(3)(D)(ii).

WHEREFORE, the government requests this Court to conduct transfer proceedings in accordance with Rule 5 of the Federal Rules of Criminal Procedure.

Respectfully submitted,

Barbara L. McQuade  
United States Attorney



April N. Russo  
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Date: *November 23, 2015*

2:15-cr-198-GZS

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

UNITED STATES OF AMERICA      )  
                                      )  
v.                                 )  
                                      )  
SAL MANSY                        )  
TV TOYZ, LLC                     )

Crim. No.

U.S. DISTRICT COURT  
PORTLAND, ME.  
FILED - NOV 17 2015

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DEPUTY CLERK

**INDICTMENT**

The Grand Jury Charges:

**COUNT ONE**

Between about March 2014 and June 2015, in the Eastern District of Michigan, District of Maine and elsewhere defendants,

**SAL MANSY  
TV TOYZ, LLC**

knowingly conducted, controlled, managed, supervised, directed, and owned all and part of a money transmitting business affecting interstate commerce, which failed to comply with the money transmitting business registration requirements set forth in Title 31, United States Code, Section 5330, and the regulations prescribed thereunder, including Title 31, Code of Federal Regulations, Section 1010.100(ff)(5).

In violation of Title 18, United States Code, Sections 1960 and 2.

**FORFEITURE ALLEGATION**

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1960, the defendants, **SAL MANSY and TV TOYZ, LLC** shall forfeit to the United States of America any property, real or personal, involved in such offense and any property traceable to such property. The property to be forfeited includes but is not limited to the following:

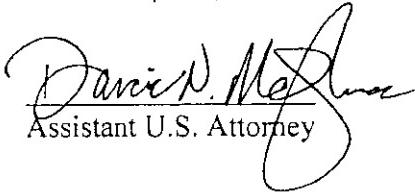
- a.     \$13,289.13 seized from account 3750 1349 3782 held at the Bank of America in the name of Sal Mansy;

- b. \$60,812.96 seized from account number 3750 1274 5428 held at the Bank of America in the name of TV TOYZ, LLC;
- c. \$44,032.48 seized from account number 227274 at Bitstamp, Ltd. held in the name of Sal Mansy;
- d. TV TOYZ, LLC, a limited liability corporation formed under the laws of the State of Michigan;
- e. real property located at 2651 Erma Drive, Shelby Township, Michigan, Parcel ID 23-07-31-199-020; and
- f. a money judgment equal to all property involved in the offense.

If any of the property described above, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

Date: 11/17/15

  
David N. McElroy  
Assistant U.S. Attorney

  
\_\_\_\_\_  
Foreperson

2:15-cr-198-GZS

Indictment Synopsis

Name:	Sal Mansy	U.S. DISTRICT COURT CLERK'S OFFICE
Address: (City & State Only)	Shelby Township, MI	2015 NOV 17 P 4:38
Year of Birth/Age:	1974/41	
Violations:	Operation of an Unlicensed Money Transmitting Business. 18 U.S.C. § 1960. Imprisonment of not more than 5 years. 18 U.S.C. § 1960(a).	
Penalties:	Fine not to exceed \$250,000. 18 U.S.C. § 3571. Class D felony. 18 U.S.C. § 3559(a)(4).	
Supervised Release:	Not more than three years. 18 U.S.C. § 3583(b)(2).	
Maximum Term of Imprisonment for Violation of Supervised Release:	Not more than two years imprisonment. 18 U.S.C. § 3583(e)(3).	
Maximum Additional Term of Supervised Release for Violation of Supervised Release:	Not more than three years less any imprisonment imposed upon revocation of supervised release. 18 U.S.C. § 3583(h).	
Defendant's Attorney:		
Primary Investigative Agency/Case Agent Name:	Homeland Security Investigations Special Agent David Fife	
Detention Status:		
Foreign National:	No	
Foreign Consular Notification Provided:	N/A	
County:	Cumberland	
AUSA:	Michael J. Conley	
Guidelines apply? Y/N	Yes	
Victim Case:	No	
Corporate Victims Owed Restitution? Y/N	No	
Assessments:	\$100	

AO 442 (Rev. 01/09) Arrest Warrant

## UNITED STATES DISTRICT COURT

for the  
District of MaineU.S. DISTRICT COURT  
PORTLAND, MAINE  
RECEIVED AND FILED

2015 NOV 18 A 8:53

United States of America

v.

Sal Mansy

Defendant

DEPUTY CLERK

Case No. 2:15-cr-198-GZS

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Sal Mansy,

who is accused of an offense or violation based on the following document filed with the court:

- Indictment     Superseding Indictment     Information     Superseding Information     Complaint  
 Probation Violation Petition     Supervised Release Violation Petition     Violation Notice     Order of the Court

This offense is briefly described as follows:

Operation of an unlicensed money transmitting business, in violation of 18 U.S.C., Sections 1960 and 2.

A TRUE COPY

ATTEST: Christa K. Berry, Clerk

By:

Date: 11/18/2015City and state: Portland, Maine

Sara Foss, Deputy Clerk

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title